Case 1:14-cr-00068-LGS Document 370 Filed 07/11/19 Page 1 of 2



Via ECF Filing Only

July 11, 2019

The Honorable Lorna G. Schofield United States District Judge Southern District of New York 500 Pearl Street Daniel Patrick Moynihan U.S. Courthouse New York, New York 10007

RE: United States v. Ross William Ulbricht, No. 14 Cr. 68 (LGS) (S.D. NY) Reply to Government's Request for Temporary Abeyance (Dkt. 369)

Dear Judge Schofield:

Ross William Ulbricht ("Ulbricht") does not oppose the Government's request for the Court to hold the Government's deadline to respond to Ulbricht's Motion to Vacate in abeyance. (Dkt. 369). Ulbricht agrees that the present circumstances warrant modification of the present July 24, 2019 deadline for the Government's response. (*See* Dkt. 363).

On June 28, 2019, two different Motions to Vacate pursuant to 28 U.S.C. § 2255 were filed on Ulbricht's behalf. (*See* Dkt. 359 and Dkt. 361-362). Undersigned counsel conferred with counsel for the Government and subsequently filed Ulbricht's Unopposed Motion to Substitute Counsel. (Dkt. 365).

Ulbricht authorizes and consents to the requested substitution of undersigned counsel in place of attorney Paul Grant. In order to dispel any further confusion regarding this matter, Ulbricht provides the Court with a copy of his personally signed written consent as Exhibit A to this letter. Ulbricht requests the Court grant his previously submitted substitution motion.

At the same time, undersigned counsel notified the Government of Ulbricht's intention to seek leave to file an amended motion to vacate in order to consolidate the pending motions before the Court. Counsel for the Government indicated to Ulbricht that they were not opposed to Ulbricht's planned request for leave to amend his motion to vacate.

Ulbricht is now seeking permission from the Court to file his amended motion to vacate no later than September 30, 2019. Ulbricht believes that the requested extension of time will allow him to present the Court with a single cogent presentation of his claims for relief and their factual bases.

Ulbricht is currently serving multiple sentences of life imprisonment. There would be no prejudice caused by the Court granting Ulbricht's request for leave to amend in this case. Further, this would allow the Government to respond to only one final amended motion to vacate and clear any doubt about the disputed issues.

Brandon Sample PLC P.O. Box 250 Rutland, VT 05702 brandonsample.com clemency.com sentencing.net Tel: (802) 444-4357 Fax: (802) 779-9590 info@brandonsample.com